

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

)	
Parker Hannifin Corporation)	
)	
Parker ITR Srl)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2:13-cv-01456
)	
Federal Insurance Company)	
)	
National Union Fire Insurance Company of)	
Pittsburgh, Pa.)	
)	
Defendants.)	
)	

**CONSENT MOTION FOR FURTHER EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Defendant Federal Insurance Company ("Federal") hereby files the following consent motion for an extension of time to respond to the Complaint.

1. Federal filed a notice of removal from the Court of Common Pleas of Allegheny County on October 7, 2013, and an amended notice of removal on October 11, 2013.
2. On October 29, 2013, the Parties stipulated pursuant to LCvR 7.E. that the deadline for Federal to answer, plead or otherwise move in response to the Complaint filed in this action would be extended to November 21, 2013.
3. Plaintiffs filed a motion to remand on November 6, 2013.
4. Federal filed its opposition to the motion to remand on November 25, 2013.
5. Because the Parties agreed that it would be beneficial for all involved to postpone the deadline for Federal to answer, plead or otherwise move in response to the Complaint until after the Court had decided the pending motion to remand, the Parties stipulated to and the Court

extended Federal's response deadline on two occasions to December 20, 2013, and then to January 21, 2014.

6. On December 26, 2013, the Court issued an Initial Local Rule 16.1 Scheduling Order setting forth deadlines for the Parties' Rule 26(f) conference, Rule 26(f) report, stipulation selecting ADR process, and Initial Rule 16 Scheduling Conference.

7. Plaintiffs have moved for an extension of the deadlines set forth in the Court's Scheduling Order (Docket #15) ("Plaintiffs' Motion"), and Federal has consented to Plaintiffs' Motion.

8. In the event the Court grants Plaintiffs' Motion, it would be beneficial for all involved to further postpone the deadline for Federal to answer, plead or otherwise move in response to the Complaint until after the Court has decided the pending motion to remand. In accordance with the Court's practice of requiring extensions to a date certain, Federal respectfully requests a further extension of Federal's response deadline to March 11, 2014.

9. Federal has conferred with Plaintiffs on this matter, and Plaintiffs consent to the instant motion.

WHEREFORE, in the event the Court grants Plaintiffs' Motion, Federal respectfully requests that the Court also extend the deadline for Federal to answer, plead or otherwise move in response to the Complaint filed in this action to March 11, 2014.

Respectfully submitted,

/s/ David Newmann

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Counsel for Defendant Federal Insurance
Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 9th day of January, 2014, the foregoing Consent Motion for Extension of Time to Respond to Complaint was filed electronically and served by operation of the ECF system on:

Andrew M. Roman
Richard A. Ejzak
Cohen & Grigsby, P.C.
625 Liberty Avenue
Pittsburgh, PA 15222-3152
Counsel for Plaintiffs

A handwritten signature in black ink, appearing to read "David Newmann", with a horizontal line extending to the right.

David Newmann